## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

This document relates to: 19-cv-10713

MASTER DOCKET 18-md-2865 (LAK)

## STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO THE AMENDED COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current June 29, 2020 deadline for Defendants Richard Markowitz, RJM Capital Pension Plan Trust, John van Merkensteijn, and Bernina Pension Plan Trust to answer the Amended Complaint filed in Case No. 19-cv-10713-LAK is hereby extended for thirty (30) days up to and including July 29, 2020.

No provisions of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the Parties' second request to modify the time to answer or otherwise respond to the Amended Complaint. By order dated May 14, 2020, this Court granted the Consolidated Defendants' request to extend the time to answer or respond to SKAT's new and amended complaints to June 29, 2020. See <u>Dkt. 336</u>.

Dated: New York, New York June 25, 2020

By: /s/ Allison Stoddart

(e-signed with consent)

Allison Stoddart

By: /s/ Marc Weinstein
(e-signed with consent)
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Counsel for Defendants John van Merkensteijn, III, Bernina Pension Plan Trust

Hon. Lewis A. Kablan

United States District Judge

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